

EXHIBIT 19

CHART 1
SUBSTANTIVE HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
12-Oct-16	Emma Freudenberger	Rosario (Richard)	Meeting	Case status meeting w/ RS & AL	0:24	0.4
3-Nov-16	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ client, NB, RS, investigator	0:30	0.5
15-Nov-16	Emma Freudenberger	Rosario (Richard)	Meeting	meeting with RR, team	1:00	1.0
23-Nov-16	Emma Freudenberger	Rosario (Richard)	Meeting	meet re appeal and doc collection	0:18	0.3
4-Dec-16	Emma Freudenberger	Rosario (Richard)	Review	reviewing police file	1:48	1.8
5-Dec-16	Emma Freudenberger	Rosario (Richard)	Review	reading transcripts	2:00	2.0
6-Dec-16	Emma Freudenberger	Rosario (Richard)	Review	reading trial transcripts	3:30	3.5
7-Dec-16	Emma Freudenberger	Rosario (Richard)	Review	reviewing related robbery docs, reviewing richard's statements	2:24	2.4
7-Dec-16	Emma Freudenberger	Rosario (Richard)	Phone Call	call with potential psych expert	0:36	0.6
8-Dec-16	Emma Freudenberger	Rosario (Richard)	Meeting	meeting with richard	4:00	4.0
20-Dec-16	Emma Freudenberger	Rosario (Richard)	Phone Call	call with chip	0:18	0.3
22-Dec-16	Emma Freudenberger	Rosario (Richard)	Phone Call	team call	0:36	0.6
13-Jan-17	Emma Freudenberger	Rosario (Richard)	Draft	review NOCs and give edits to rick	1:18	1.3
24-Jan-17	Emma Freudenberger	Rosario (Richard)	Meeting	team meeting	0:12	0.2
27-Jan-17	Emma Freudenberger	Rosario (Richard)	Meeting	team meet w/ investigator	0:24	0.4
8-Feb-17	Emma Freudenberger	Rosario (Richard)	Meeting	investigation meeting	0:48	0.8
6-Mar-17	Emma Freudenberger	Rosario (Richard)	Phone Call	call about robbery case	0:48	0.8
16-Mar-17	Emma Freudenberger	Rosario (Richard)	phone call	Phone call w/ RS and co-counsel re: Richard's criminal case	0:24	0.4
28-Mar-17	Emma Freudenberger	Rosario (Richard)	Meeting	meeting re 50h prep, call to richard	0:36	0.6
29-Mar-17	Emma Freudenberger	Rosario (Richard)	Prep	50 h prep	4:00	4.0
30-Mar-17	Emma Freudenberger	Rosario (Richard)	Prep	50 h prep	2:12	2.2
30-Mar-17	Emma Freudenberger	Rosario (Richard)	Meeting	meeting with patrick about witnesses	1:42	1.7
3-Apr-17	Emma Freudenberger	Rosario (Richard)	Phone Call	call w richard and RS	0:24	0.4
3-Apr-17	Emma Freudenberger	Rosario (Richard)	Phone Call	calls with Richard, Chip	1:00	1.0
10-Apr-17	Emma Freudenberger	Rosario (Richard)	Meeting	meeting w client and chip	3:00	3.0
4-May-17	Emma Freudenberger	Rosario (Richard)	Review	reviewi complaint, give rick edits (yesterday and today 6.7 hours)	6:42	6.7
11-May-17	Emma Freudenberger	Rosario (Richard)	Prep	prep	2:36	2.6
25-May-17	Emma Freudenberger	Rosario (Richard)	Prep	50 h prep	4:30	4.5
26-May-17	Emma Freudenberger	Rosario (Richard)	Prep	final 50 h prep	2:00	2.0
30-May-17	Emma Freudenberger	Rosario (Richard)	Other	50 -h and pre-meeting w richard	9:00	9.0
1-Jun-17	Emma Freudenberger	Rosario (Richard)	Meeting	Investigation meeting	2:00	2.0
13-Jun-17	Emma Freudenberger	Rosario (Richard)	phone call	Phone call w/ RS, client re: case strategy	0:12	0.2

15-Aug-17	Emma Freudenberger	Rosario (Richard)	Phone Call	calls with Richard, Marty, follow up emails	1:18	1.3
21-Dec-17	Emma Freudenberger	Rosario (Richard)	Review	complaint review	3:24	3.4
22-Dec-17	Emma Freudenberger	Rosario (Richard)	Draft	complaint review	2:30	2.5
16-Apr-18	Emma Freudenberger	Rosario (Richard)	Meeting	Case meeting	0:18	0.3
5-Jun-18	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS	0:06	0.1
21-Aug-18	Emma Freudenberger	Rosario (Richard)	Meeting	case meeting	0:30	0.5
4-Sep-18	Emma Freudenberger	Rosario (Richard)	Discovery	reviewing 26 disclosures	0:48	0.8
7-Sep-18	Emma Freudenberger	Rosario (Richard)	Meeting	meet re: case strategy	0:18	0.3
13-Sep-18	Emma Freudenberger	Rosario (Richard)	Phone Call	phone call w/ Chip and RS re: case strategy	0:18	0.3
20-Sep-18	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ opposing counsel	0:06	0.1
22-Oct-18	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS, ABH re: case strategy	0:12	0.2
26-Oct-18	Emma Freudenberger	Rosario (Richard)	Review	premotion conference letter review	2:18	2.3
5-Nov-18	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: court hearing	0:18	0.3
				meeti with rick before premotion conference, pre motion conference		
6-Nov-18	Emma Freudenberger	Rosario (Richard)	Court appearance		3:30	3.5
4-Dec-18	Emma Freudenberger	Rosario (Richard)	Meeting	meet re case strategy	0:24	0.4
14-Dec-18	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ NB, EF, AF re: deposition scheduling	0:18	0.3
17-Dec-18	Emma Freudenberger	Rosario (Richard)	Meeting	Meet re deps, discovery	0:30	0.5
18-Dec-18	Emma Freudenberger	Rosario (Richard)	Meeting	witness interview meeting	0:06	0.1
20-Dec-18	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re MTD	0:30	0.5
24-Dec-18	Emma Freudenberger	Rosario (Richard)	Miscellaneous	emails and calls re city dep position	2:06	2.1
27-Dec-18	Emma Freudenberger	Rosario (Richard)	Miscellaneous	edits to discovery letter	2:18	2.3
28-Dec-18	Emma Freudenberger	Rosario (Richard)	Miscellaneous	editing and filing letter on deps	5:12	5.2
2-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meeting with Rick	0:24	0.4
3-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	case strategy, etc meeting	0:48	0.8
7-Jan-19	Emma Freudenberger	Rosario (Richard)	Phone Call	witness call	0:24	0.4
8-Jan-19	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ expert & RS	0:06	0.1
8-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ NB, RS, AF re: dep scheduling.	0:12	0.2
9-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	case meeting/team meeting	0:42	0.7
15-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ NB, RS, LK, and AF re: deposition strategy	0:54	0.9
23-Jan-19	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ RS re: discovery responses	0:30	0.5
25-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: discovery response and demands	0:18	0.3
25-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meeting w/ NB,RS, LK, AF re: case strategy and deps	0:24	0.4
29-Jan-19	Emma Freudenberger	Rosario (Richard)	Deposition	attendign sanchez dep, meetings during sanchez dep	1:48	1.8
30-Jan-19	Emma Freudenberger	Rosario (Richard)	Deposition	davis dep	3:00	3.0
30-Jan-19	Emma Freudenberger	Rosario (Richard)	Meeting	Team meeting w/ NB, RS, LK, AF re: deposition	0:12	0.2
7-Feb-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ NB, RS, LK, AF re: case strategy and depositions	0:36	0.6

8-Feb-19	Emma Freudenberger	Rosario (Richard)	Prep	Chip dep prep	0:24	0.4
13-Feb-19	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ RS re: Chip dep	0:24	0.4
14-Feb-19	Emma Freudenberger	Rosario (Richard)	Deposition	Chip deposition	5:12	5.2
15-Feb-19	Emma Freudenberger	Rosario (Richard)	Draft	Edits to letter motion for more deps, call with nick about letter motion	1:36	1.6
19-Feb-19	Emma Freudenberger	Rosario (Richard)	Draft	finalizing letter motion	1:00	1.0
20-Feb-19	Emma Freudenberger	Rosario (Richard)	Draft	Edits to letter motion for conference	2:42	2.7
1-Mar-19	Emma Freudenberger	Rosario (Richard)	Phone Call	call with rick	0:30	0.5
12-Mar-19	Emma Freudenberger	Rosario (Richard)	Draft	reviewing joint status letter	0:42	0.7
13-Mar-19	Emma Freudenberger	Rosario (Richard)	Meeting	sleopian meeting	4:00	4.0
19-Mar-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS, LK, NB re: case strategy, depositions	1:12	1.2
20-Mar-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: discovery responses	0:12	0.2
21-Mar-19	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ Rick and Chip	0:18	0.3
29-Mar-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: discovery responses	0:18	0.3
29-Mar-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS, NB, LK, AF re: discovery, case strategy, experts	0:30	0.5
1-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet re: discovery responses	0:42	0.7
3-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet re: request to admit responses	0:24	0.4
9-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: discovery	0:48	0.8
10-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meeting w/ RS, AF re: discovery	0:24	0.4
12-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meeting re: document production, psych expert report, requests to admit	1:12	1.2
18-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: discovery	0:18	0.3
23-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: expert	0:06	0.1
25-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: expert report	0:18	0.3
29-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS, NB re: discovery	0:18	0.3
30-Apr-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: discovery dispute	0:24	0.4
1-May-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet re: discovery	0:36	0.6
3-May-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: Joyce Hartsfield	0:18	0.3
6-May-19	Emma Freudenberger	Rosario (Richard)	Meeting	Discuss Hartsfield dep w/ Rick	0:18	0.3
7-May-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS, NB, AF re: expert report revisions	0:30	0.5
8-May-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS & NB re: expert report	0:48	0.8
10-May-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS re: discovery letter	0:12	0.2
16-May-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	responding to counsel on outstanding discovery issues, speaking to chip re deposition	1:18	1.3
17-May-19	Emma Freudenberger	Rosario (Richard)	Phone Call	call with Chip re dep prep	0:30	0.5
17-May-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	email to opposing counsel	0:18	0.3

20-May-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	meet and confer with opposing counsel, discussing contention ROG responses	0:54	0.9
21-May-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	reviewing Cruger with Len, meeting with Rick about ROG draft, scheduling Chip's deposition	1:24	1.4
22-May-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	reviewing rosario privilege log, emails re chips dep, discussion with rick about discovery loose ends	0:30	0.5
22-May-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	editing rosario letters, editing contention rogs, feedback on contention rogs, strategy discussions re rogs and ocurr orders	7:00	7.0
23-May-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	reviewing filings, RTAs, discussing robbery vacatur	0:48	0.8
3-Jun-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	supervising alexis gonzalez dep while nick in meeting, follow-up conversation with rick and len about proof	2:42	2.7
26-Jun-19	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ RS, AF & Chip re: case	0:54	0.9
9-Jul-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet re: Ds proposed IME	0:12	0.2
16-Jul-19	Emma Freudenberger	Rosario (Richard)	Review	reviewing psych motion practice, discussing response with rick, reviewing expert reports	1:18	1.3
22-Jul-19	Emma Freudenberger	Rosario (Richard)	Meeting	meeting with rick and nick to discuss ichard instagram issues	0:18	0.3
23-Jul-19	Emma Freudenberger	Rosario (Richard)	Phone Call	call to brachah about social media, follow up conversation with rick	0:30	0.5
3-Sep-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ NB, RS re: experts, discovery	0:18	0.3
6-Sep-19	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ expert Dysart, NB, RS, LK	0:48	0.8
9-Sep-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS & NB re: expert deps	0:12	0.2
11-Sep-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS, NB re discovery letter	0:24	0.4
15-Sep-19	Emma Freudenberger	Rosario (Richard)	Review	reading, editing reply on expert deps	0:42	0.7
16-Sep-19	Emma Freudenberger	Rosario (Richard)	Miscellaneous	meeting with nick and rick about expert issues, reviewing correspondance and reports	1:18	1.3
10-Oct-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS & LK re: expert	0:12	0.2
15-Oct-19	Emma Freudenberger	Rosario (Richard)	Review	Discuss w/ LK and RS disclosure of expert discovery	0:12	0.2
16-Oct-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS to discuss Dysart dep	0:06	0.1
30-Oct-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS, ABH re: SJ letter	0:18	0.3
4-Nov-19	Emma Freudenberger	Rosario (Richard)	Draft	edits to premotion letter	0:48	0.8
5-Nov-19	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ NB & RS re: SJ letter	0:12	0.2
7-Nov-19	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ RS & BR re: Rosario SJ	0:24	0.4
11-Nov-19	Emma Freudenberger	Rosario (Richard)	Prep	premotion conference prep	2:30	2.5
12-Nov-19	Emma Freudenberger	Rosario (Richard)	Court appearance	rosario pre motion conference, discussing with nick ahead of time	0:48	0.8
18-Dec-19	Emma Freudenberger	Rosario (Richard)	Meeting	Rosario sj meeting	0:30	0.5

13-Jan-20	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ NB, ABH, RS, AS, AF, BR re: MSJ response	0:54	0.9
16-Jan-20	Emma Freudenberger	Rosario (Richard)	Miscellaneous	team meeting, follow up conversations with nick and rick	2:24	2.4
24-Jan-20	Emma Freudenberger	Rosario (Richard)	Meeting	Discuss motion to dismiss w/ RS	0:06	0.1
10-Feb-20	Emma Freudenberger	Rosario (Richard)	Meeting	Meet w/ NB, RS, ABH, AS, BR re: MSJ Opp	1:36	1.6
18-Feb-20	Emma Freudenberger	Rosario (Richard)	Review	reading sj briefs, meeting	3:42	3.7
19-Feb-20	Emma Freudenberger	Rosario (Richard)	Review	final sj review, feedback	2:24	2.4
21-Feb-20	Emma Freudenberger	Rosario (Richard)	Miscellaneous	sending sj to richard and chip	0:24	0.4
16-Apr-20	Emma Freudenberger	Rosario (Richard)	Phone Call	Phone call w/ RS & ABH re: SJ reply	0:18	0.3
17-Apr-20	Emma Freudenberger	Rosario (Richard)	Miscellaneous	talk to anna, rick re: response to brachah	0:24	0.4
21-Jan-21	Emma Freudenberger	Rosario (Richard)	Phone Call	talk to anna/emma re: daubert plan	0:24	0.4
22-Jan-21	Emma Freudenberger	Rosario (Richard)	Phone Call	W/ nick, anna, katie haas, kayla, talk to chip re: Strategy	0:30	0.5
22-Jan-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Nick, Katie H, Anna and Rick re Daubert motions	0:18	0.3
5-Feb-21	Emma Freudenberger	Rosario (Richard)	Phone Call	W/ anna, talk to bettina re: Pretrial schedule	0:30	0.5
10-Feb-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Rosario call and follow up emails	0:30	0.5
18-Feb-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Pretrial planning call w/ NB, ABH, BR, KH, KJ.	1:00	1.0
22-Feb-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Katie H and Kayla re trial prep	0:30	0.5
24-Feb-21	Emma Freudenberger	Rosario (Richard)	Phone Call	w/ anna and nick discuss prep for status conference re: trial procedure	0:24	0.4
1-Mar-21	Emma Freudenberger	Rosario (Richard)	Meeting	w/ anna and bettina, then just anna discuss pretrial briefing requirement, plan	0:42	0.7
9-Mar-21	Emma Freudenberger	Rosario (Richard)	Meeting	Meetings re Daubert	1:06	1.1
12-Mar-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Team call on MILs	0:42	0.7
18-Mar-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	Calls emails	1:30	1.5
23-Mar-21	Emma Freudenberger	Rosario (Richard)	Phone Call	W/ anna, katie h, kayla talk to brachah re: MILs, pretrial filings	0:42	0.7
25-Mar-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Katie H and potential damages witness	0:30	0.5
8-Apr-21	Emma Freudenberger	Rosario (Richard)	Meeting	Meeting with Katie H and Kayla	0:30	0.5
9-Apr-21	Emma Freudenberger	Rosario (Richard)	Phone Call	W/ nick, anna, katie h discuss draft jury instructions	0:42	0.7
16-Apr-21	Emma Freudenberger	Rosario (Richard)	Phone Call	W/ anna, talk to katie h re: MILs	0:48	0.8
19-Apr-21	Emma Freudenberger	Rosario (Richard)	Meeting	w/ nick, anna, katie h, yasmin, jahne, kayla discuss draft jury questionnaire	1:30	1.5
18-May-21	Emma Freudenberger	Rosario (Richard)	Meeting	Mtg with Anna and Katie H re deadlines and priorities	0:30	0.5
24-May-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	Reading brief, call with chip et al	0:48	0.8
27-May-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Katie H and opposing counsel	0:12	0.2
10-Jun-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Discuss MIL plan w/ nick, anna, katie h, kayla	0:42	0.7
10-Jun-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Kayla re Minerva's digest.	0:12	0.2
21-Jun-21	Emma Freudenberger	Rosario (Richard)	Meeting	W/ nick, anna, katie h, christina, kayla discuss MIL opp	0:48	0.8

22-Jun-21	Emma Freudenberger	Rosario (Richard)	Meeting	Talk to nick, anna re: MILs	0:24	0.4
23-Jun-21	Emma Freudenberger	Rosario (Richard)	Meeting	Talk to anna, katie h. Re; MIL responses	0:12	0.2
25-Jun-21	Emma Freudenberger	Rosario (Richard)	Meeting	W/ anna, christina, katie h, bianca, rhianna discuss MIL opp	0:42	0.7
30-Jun-21	Emma Freudenberger	Rosario (Richard)	Draft	Met w/ Rhianna about draft response to MIL.	0:25	0.5
6-Jul-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Katie H and Kayla re stipulations	0:09	0.2
7-Jul-21	Emma Freudenberger	Rosario (Richard)	Meeting	W/ anna, katie h discuss MIL re: Vacated robbery conviction	0:12	0.2
12-Jul-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Talk to nick, anna, re: MIL strategy	0:12	0.2
13-Jul-21	Emma Freudenberger	Rosario (Richard)	Meeting	W/ nick, anna discuss edits to MIL opposition	0:30	0.5
19-Jul-21	Emma Freudenberger	Rosario (Richard)	Phone Call	W/ anna, katie h discuss plan for pretrial briefing	0:12	0.2
19-Jul-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Kayla, Katie H, and Carlos Malonado.	1:00	1.0
25-Aug-21	Emma Freudenberger	Rosario (Richard)	Phone Call	W/ anna, katie h discuss pretrial filings	0:30	0.5
30-Aug-21	Emma Freudenberger	Rosario (Richard)	Prep	Reading transcripts and designations	3:24	3.4
1-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	Team meeting, prep for team meeting	1:42	1.7
3-Sep-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Calls to witnesses, call with nick	0:54	0.9
3-Sep-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with intern and katie about silverman motion, reviewing notes from initial assignment	0:30	0.5
6-Sep-21	Emma Freudenberger	Rosario (Richard)	Prep	Reviewing docs for exhibit list, designations	4:00	4.0
7-Sep-21	Emma Freudenberger	Rosario (Richard)	Prep	Exhibit/trial prep meeting with nick and katie	2:18	2.3
7-Sep-21	Emma Freudenberger	Rosario (Richard)	Review	Reviewing damages exhibits	0:48	0.8
8-Sep-21	Emma Freudenberger	Rosario (Richard)	Prep	Stipulations and JPTO drafts	3:30	3.5
8-Sep-21	Emma Freudenberger	Rosario (Richard)	Prep	Dep designations	1:18	1.3
10-Sep-21	Emma Freudenberger	Rosario (Richard)	Phone Call	calls with Katie H re JPTO	0:12	0.2
12-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	Trial prep work, JPTO, witness review	5:00	5.0
13-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	JPTO edits	5:00	5.0
15-Sep-21	Emma Freudenberger	Rosario (Richard)	Prep	Pretrial tasks	1:00	1.0
16-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	Email to brachah re JPTO, call with KAtie about jury questionnaire motion, call with Anna and Nick about verdict sheet, correspondance with kayla about exhibits, call with Nick about trial date	3:00	3.0
17-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	reviewing jury questionnaire motion, call with nick, edits to katie	1:30	1.5
23-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	trial prep, reviewng letter	0:30	0.5
26-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	reviewing serrano transcript and video, call to serrano, emails to nick	2:30	2.5
28-Sep-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	meeting with jury consultants, pretrial order doc review	3:24	3.4
28-Sep-21	Emma Freudenberger	Rosario (Richard)	Prep	meeting on voir dire	1:00	1.0

29-Sep-21	Emma Freudenberger	Rosario (Richard)	Prep	conviction designations for trial, reivewing letters, photos	4:42	4.7
30-Sep-21	Emma Freudenberger	Rosario (Richard)	Review	reviewing filings, reviewing JPTO, trial prep	5:00	5.0
5-Oct-21	Emma Freudenberger	Rosario (Richard)	Review	reviewing pretrial docs	3:30	3.5
5-Oct-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	rosario jury instructions and miscellaneous pretrial orderr questions	2:30	2.5
6-Oct-21	Emma Freudenberger	Rosario (Richard)	Phone Call	pretrial call	1:00	1.0
7-Oct-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	reviewing pretrial docs and filings, emails with opposing counsel, meetings with katie about same	4:00	4.0
7-Oct-21	Emma Freudenberger	Rosario (Richard)	Phone Call	call with richard, email with chips	0:24	0.4
20-Oct-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	follow up calls to witnesses, call with patrick, call with nick, katie re letter	1:00	1.0
22-Oct-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	materials to Patrick, call with Adam Bloom	0:48	0.8
26-Oct-21	Emma Freudenberger	Rosario (Richard)	Phone Call	Call with Adam Bloom, Kayla, Nick, and Katie H.	0:18	0.3
27-Oct-21	Emma Freudenberger	Rosario (Richard)	Prep	Calls to witnesses, calls with patrick, call with chip, call with richard, meeting w nick	2:30	2.5
24-Nov-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	call with brachah, meeting with nick about trial	0:48	0.8
2-Dec-21	Emma Freudenberger	Rosario (Richard)	Phone Call	team call, dep and police file review	3:00	3.0
6-Dec-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	conference, trial prep meeting, prep for team meeting, reviewing pretrial docs	5:00	5.0
7-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	exhibit meeting, reviewing police docs, substantive trial prep	4:42	4.7
8-Dec-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	trial prep	2:12	2.2
9-Dec-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	team meeting, reviewing alibi deps	4:18	4.3
10-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	calls with katie re exhibits, exhibit review, trial prep	5:00	5.0
11-Dec-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	trial prep	4:42	4.7
12-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	trial prep	3:30	3.5
13-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	trial prep	2:48	2.8
15-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	prep for pretrial conference, josh re jury roll list research, team meetings and witness calls, trial prep	6:48	6.8
16-Dec-21	Emma Freudenberger	Rosario (Richard)	Court appearance	prep for pretrial conference, pretrial conference, check-in re rulings on exhibits post-conference	3:00	3.0
17-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	meeting re trial assignments, trial prep	5:24	5.4
18-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	Sanchez digest, prep, reviewing Cruger, opening	5:30	5.5
19-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	opening, trial prep	5:12	5.2
20-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	pretrial submission review, trial prep incl witness outreach & outlines, opening	4:18	4.3
21-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	prep for PTC, PTC, follow up meeting, trial prep	6:18	6.3

22-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	trial prep including dysart outline, letters, juror issues, outline review, opening, meet and confer and prep/follow-up	10:12	10.2
23-Dec-21	Emma Freudenberger	Rosario (Richard)	Miscellaneous	letter review/revisions, call with Brachah	1:48	1.8
24-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	letter review, trial prep	2:42	2.7
27-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	Martinez outline, opening, reviewing admissions, reviewing dep video, communications with witnesses, general trial prep	9:00	9.0
28-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	trial logistics/binders call, exhibit meeting, Alexis gonzalez letter, Petruskas outline, misc trial prep, opening work	8:48	8.8
29-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	call with dysart, dysart outline, reviewing draft re vacatur letter, opening edits, misc exhibit trial prep questions and review, whitaker review	9:00	9.0
30-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	revising fernando letter, witness order, opening edits, dysart, revieiwng outline drafts	8:42	8.7
31-Dec-21	Emma Freudenberger	Rosario (Richard)	Prep	opening edits, trial prep, witness calls	3:30	3.5
3-Jan-22	Emma Freudenberger	Rosario (Richard)	Phone Call	call with nick, call with nick and anna, updating to do list	0:42	0.7
4-Jan-22	Emma Freudenberger	Rosario (Richard)	Phone Call	cal w/ nick, Anna, katie h, gerardo, kayla, cam to discuss next steps	0:30	0.5
5-Jan-22	Emma Freudenberger	Rosario (Richard)	Phone Call	call w/ nick, Anna, Katie h, Gerardo re trial date	0:24	0.4
5-Jan-22	Emma Freudenberger	Rosario (Richard)	Phone Call	call w katie re direct examination outline	0:24	0.4
7-Jan-22	Emma Freudenberger	Rosario (Richard)	Prep	calls with nick, amelia, anna, katie H re trial date, email to team	1:24	1.4
8-Jan-22	Emma Freudenberger	Rosario (Richard)	Prep	opening, petrauskas digest	4:30	4.5
9-Jan-22	Emma Freudenberger	Rosario (Richard)	Prep	Editing opening, practicing opening, petrauskas outline	6:18	6.3
10-Jan-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	team call, editing opening, meeting on exhibits, martinez edits, call with Dysart, call with Katie, editing letter to court, calls to witnesses	5:18	5.3
11-Jan-22	Emma Freudenberger	Rosario (Richard)	Prep	outlines, team calls on exhibits and demonstratives, calls with Nick about Davis	4:18	4.3
12-Jan-22	Emma Freudenberger	Rosario (Richard)	Prep	prep for conference, conference, meeting to prep for conference, calls to witnesses	5:00	5.0
13-Jan-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	response to adjournment request, call with Hannah Faddis, call with Nick, drafting letter	2:18	2.3
14-Jan-22	Emma Freudenberger	Rosario (Richard)	Court appearance	Telephonic conference with court	0:30	0.5
10-Feb-22	Emma Freudenberger	Rosario (Richard)	Review	reviewing 56.1 drafts	1:30	1.5
27-Apr-22	Emma Freudenberger	Rosario (Richard)	Meeting	meet and confer re jury instructions	0:19	0.3

29-Apr-22	Emma Freudenberger	Rosario (Richard)	Meeting	talk to anna, then w/ anna to katie re: filing on limiting instructions	0:18	0.3
5-May-22	Emma Freudenberger	Rosario (Richard)	Meeting	Meeting with Cam and Katie H	0:45	0.8
6-May-22	Emma Freudenberger	Rosario (Richard)	Meeting	Meeting with Cam and Katie H	0:30	0.5
10-May-22	Emma Freudenberger	Rosario (Richard)	Meeting	team meeting re: trial plan	1:06	1.1
13-May-22	Emma Freudenberger	Rosario (Richard)	Phone Call	Calls with Katie	0:09	0.2
25-May-22	Emma Freudenberger	Rosario (Richard)	Court appearance	status conference, follow up call with nick	0:54	0.9
27-May-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	reviewing courts orders, meeting with katie, reviewing questionnaire	1:00	1.0
31-May-22	Emma Freudenberger	Rosario (Richard)	Meeting	W/ anna, gerardo discuss jury questionnaire	0:18	0.3
3-Jun-22	Emma Freudenberger	Rosario (Richard)	Phone Call	Calls with Katie re joint letter	0:30	0.5
6-Jun-22	Emma Freudenberger	Rosario (Richard)	Meeting	W/ katie h, Anna discuss response to letter re: Robbery investigation	0:12	0.2
14-Jun-22	Emma Freudenberger	Rosario (Richard)	Prep	opening for firm, post-opening feedback meeting, follow up with staff for feedback on opening	4:00	4.0
15-Jun-22	Emma Freudenberger	Rosario (Richard)	Prep	opening revisions	2:24	2.4
16-Jun-22	Emma Freudenberger	Rosario (Richard)	Meeting	meet and confer gerardo katie cam opp counsel	0:15	0.3
16-Jun-22	Emma Freudenberger	Rosario (Richard)	Meeting	onboarding new team members	0:30	0.5
5-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	team meeting, follow up with katie and cam re subpoenas	1:42	1.7
6-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	prep for team meeting, team meeting, exhibit review, police file review	2:30	2.5
7-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	trial prep, incl meeting with Katie re rulings, witness follow up, substantive prep	5:18	5.3
8-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	trial prep	4:18	4.3
9-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	calls w nick and richard, call w jenine torres, call w john torres	2:30	2.5
10-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	dysart outline, calls w nick re richard, call w richard	4:30	4.5
11-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	call with dysart, opening editing, meeting on opening with nick and anna, meeting with cam about logistics, supplies, exhibits, opening revisions, call with kate about richard, calls with nick about richard, opening, witnesses, calls to alibi witnesses, NT	9:12	9.2
12-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	revieiwng davis, dysart and torres outlines, call w chenoa, general trial prep tasks, call w katie, team meeting	9:00	9.0
13-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	trial prep, dysart, torres outlines, opening, para supervision, calls w nick re vacatur, silverman, etc.	9:30	9.5
14-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	trial prep, dysart outline, torres, reviewing designations, meeting w gerardo, meeting w anna	8:18	8.3

15-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	prep for prep with chip, prep with chip, call with renato, follow up work re voir dire prep	4:30	4.5
16-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	revising opening, reviewing Whitaker, Dysart outline	6:42	6.7
17-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	trial prep, opening, outlines, calls with associates, nick	7:30	7.5
18-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	meet and confer re texts, team meeting, prep with dysart, reviewing Nick outlines, opening edits, alibi witness outlines	9:00	9.0
19-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	opening edits and practice, prep for pretrial conference, pretrial conference, jury questionnaire review, meeting with nick, phone calls	7:36	7.6
20-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	Dysart prep, prep for Dysart prep, meeting on exhibits, reviewing exhibits and binders, martinez review	8:24	8.4
21-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	opening, press, team calls & meetings, dysart outline edits, alibi outlines	9:48	9.8
22-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	prep with dysart, opening revisions, tech walkthrough, team meeting, martinez/whitaker outline, witness calls	10:02	10.0
23-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	dysart prep, revising opening, meeting with nick, supervising filings, team calls	9:00	9.0
24-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	jury selection meeting, rehearsing opening, prep with jen, prep team meetings, designation meetings	13:00	13.0
25-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	jury selection, openings, practicing opening, post trial meeting, prepping chenoa, call with dysart, silverman designation meeting	11:30	11.5
26-Jul-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	pretrial meetings, trial, post trial meeting	10:18	10.3
27-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	team meetings, maritnez prep, torres prep, calls with jerry, call with minerva	10:18	10.3
28-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	team meetings, martinz prep, nitcole torres strategy, john torres videos	8:30	8.5
29-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	meeting with richard, meeting with kate, team meeting, exhibit meeting, martinez prep, reviewing filings, reviewing cruger, etc.	11:48	11.8
30-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	martinez prep, meeting about whitaker and cruger, reviewing whitaker and cruger, reviewing john and jenine prior statements and outlines, revising cop outlines, meeting re richard, reviewing and strategizing re lymari rulings, sanchez strategy mtg	11:00	11.0

31-Jul-22	Emma Freudenberger	Rosario (Richard)	Prep	meeting with richard, Nicole Torres prep, NT outline review, zoom with John and Janine, John and Janine outline work, team check in, answering questions re exhibits, etc., call with opposing counsel	11:42	11.7
1-Aug-22	Emma Freudenberger	Rosario (Richard)	Court appearance	trial, meeting with John and Jenine, prep for John and Jenine meeting, edits to John and Jenine outlines	12:18	12.3
2-Aug-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	trial, prep, team meetings	10:30	10.5
3-Aug-22	Emma Freudenberger	Rosario (Richard)	Court appearance	trial, martinez and chip prep	15:30	15.5
4-Aug-22	Emma Freudenberger	Rosario (Richard)	Court appearance	martinez prep, trial, post-trial meeting	11:30	11.5
5-Aug-22	Emma Freudenberger	Rosario (Richard)	Prep	petrauskas outline, chip outline, team meetings, letter re petrauskas	8:12	8.2
6-Aug-22	Emma Freudenberger	Rosario (Richard)	Prep	Richard prep, Chip prep, petrauskas prep, tx review for closing	7:12	7.2
7-Aug-22	Emma Freudenberger	Rosario (Richard)	Prep	pre w richard, prep w chip, petrauskas prep, meetings re exhibits, testimony before resting, closing	9:00	9.0
8-Aug-22	Emma Freudenberger	Rosario (Richard)	Court appearance	trial, pretrial prep, closing work, petrauskas prep	14:00	14.0
9-Aug-22	Emma Freudenberger	Rosario (Richard)	Court appearance	trial, petrauskas morning prep, closing	15:30	15.5
10-Aug-22	Emma Freudenberger	Rosario (Richard)	Miscellaneous	drafting rebuttal section pre-court, closings, court appearance re City motions, ROGs, transcript review for jury note, meeting with richard after court	8:48	8.8
11-Aug-22	Emma Freudenberger	Rosario (Richard)	Court appearance	calls with richard and chip, nick, re deliberations, transcript review for note, appearance for jury verdict	3:12	3.2

Total	759.3
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CHART 2
FEE PETITION HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
22-Aug-22	Emma Freudenberg	Rosario (Richard)	Phone Call	talk to anna re: fee petition	0:12	0.2
23-Aug-22	Emma Freudenberg	Rosario (Richard)	Phone Call	Call with Sona, Anna, Cam re fee petition	0:30	0.5
25-Aug-22	Emma Freudenberg	Rosario (Richard)	Phone Call	W/ nick, anna, chip talk to richard re: Next steps	0:24	0.4
26-Aug-22	Emma Freudenberg	Rosario (Richard)	Phone Call	Call re: Fee petition w/ anna, cam, sara	0:18	0.3
23-Sep-22	Emma Freudenberg	Rosario (Richard)	Miscellaneous	meeting re fee petition	0:30	0.5
30-Sep-22	Emma Freudenberg	Rosario (Richard)	Miscellaneous	reviewing Madhuri's research, meeting re fee application	1:00	1
2-Oct-22	Emma Freudenberg	Rosario (Richard)	Miscellaneous	reviewing emails	0:24	0.4
5-Oct-22	Emma Freudenberg	Rosario (Richard)	Miscellaneous	reviewing declaration and brief	1:30	1.5
6-Oct-22	Emma Freudenberg	Rosario (Richard)	Miscellaneous	answering questions re declarations	0:24	0.4

Total	5.2
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